

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

NETWORK SYSTEM TECHNOLOGIES,
LLC,

Plaintiff.

v.

QUALCOMM INCORPORATED,
QUALCOMM TECHNOLOGIES, INC.,
QUALCOMM CDMA TECHNOLOGIES
ASIA-PACIFIC PTE LTD., QUALCOMM
GLOBAL TRADING PTE LTD. and
ARTERIS, INC.,

Defendants.

Civil Action No. 1:22-cv-1331-DAE

JURY TRIAL DEMANDED

**DECLARATION OF RYAN D. RYPKA IN SUPPORT OF QUALCOMM'S OPPOSED
MOTION TO STAY DEADLINES AFTER THE CLOSE OF FACT DISCOVERY**

I, Ryan D. Rypka, hereby declare as follows:

1. I am an attorney at Carlson, Caspers, Vandenburg & Lindquist, P.A., counsel of record for Defendants Qualcomm Incorporated, Qualcomm Technologies, Inc., Qualcomm CDMA Technologies Asia-Pacific PTE Ltd., and Qualcomm Global Trading PTE Ltd. (collectively "Qualcomm").

2. Exhibit A is a true and correct copy of the Final Written Decision in *Qualcomm Incorporated v. Network System Technologies, LLC*, IPR2024-00338, Paper 69 (PTAB Jun. 13, 2025).

3. Exhibit B is a true and correct copy of the Final Written Decision in *Qualcomm Incorporated v. Network System Technologies, LLC*, IPR2024-00343, Paper 65 (PTAB Jun. 13, 2025).

4. Exhibit C is a true and correct copy of a letter sent by counsel for Qualcomm to counsel for Network System Technologies, LLC (“NST”) on June 20, 2025.

5. Exhibit D is a true and correct copy of an email sent by counsel for NST to counsel for Qualcomm on June 30, 2025.

6. Exhibit E is a true and correct copy of an email sent by counsel for Qualcomm to counsel for NST on July 3, 2025.

7. Exhibit F is a true and correct copy of Patent Owner’s Request for Director Review of the Final Written Decision filed in *Qualcomm Incorporated v. Network System Technologies, LLC*, IPR2024-00338, Paper 70 (PTAB July 14, 2025).

8. Exhibit G is a true and correct copy of Patent Owner’s Request for Rehearing filed in *Qualcomm Incorporated v. Network System Technologies, LLC*, IPR2024-00343, Paper 66 (PTAB July 14, 2025).

9. Exhibit H is a true and correct copy of the document produced as Bates number HOUCK_0000157 in this case. **Filed under seal.**

10. Exhibit I is a true and correct copy of the document produced as Bates numbers HOUCK_0000158-HOUCK_0000192 in this case. **Filed under seal.**

11. Exhibit J contains true and correct excerpts of the transcript of the deposition of Thomas Loureiro on July 8, 2025. **Filed under seal.**

12. Exhibit K contains true and correct excerpts of the transcript of the deposition of Warren Hurwitz on July 9, 2025. **Filed under seal.**

13. Exhibit L contains true and correct screenshots from NST’s Technology Tutorial submitted in this case (Dkt. 89). The first screenshot is an image relating to U.S. Pat. No. 7,373,449 and was taken at timestamp 10:39 of the video. The second screenshot is an image

relating to U.S. Pat. No. 7,594,052 and was taken at timestamp 11:15 of the video. The third screenshot is an image relating to U.S. Pat. No. 7,366,818 and was taken at timestamp 12:41. The fourth screenshot is an image relating to U.S. Pat. No. 8,072,893 and was taken at timestamp 13:21 of the video.

I state under penalty of perjury that the foregoing is true and correct.

Dated: July 17, 2025

/s/ Ryan D. Rypka
Ryan D. Rypka (*pro hac vice*)
CARLSON, CASPERS, VANDENBURGH
& LINDQUIST, P.A.
225 S. Sixth Street, Suite 4200
Minneapolis, MN 55402
Telephone: (612) 436-9600
rrypka@carlsoncaspers.com